

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

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In re: )  
 ) Case No. 13-53846  
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CITY OF DETROIT, MICHIGAN, )  
 ) In Proceedings Under  
 ) Chapter 9  
Debtor. )  
 ) Hon. Steven W. Rhodes  
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**WAYNE COUNTY’S WITNESS LIST IN CONNECTION WITH CONFIRMATION OF THE  
DEBTOR’S FOURTH AMENDED PLAN OF ADJUSTMENT**

Wayne County, Michigan, a Michigan Constitutional corporation, a party-in-interest in this case, by and through its County Executive, Robert A. Ficano (“Wayne County”), states that it may call the following fact witnesses at the Confirmation Hearing:

Number	Name	Topics:
1.	Solon Phillips, Wayne County Deputy Chief of Staff to Wayne County Executive	<ul style="list-style-type: none"><li>• Plan Feasibility</li><li>• Debtor’s Good Faith</li></ul>
2.	Fran Moy-Johnson, Wayne County Department of Public Service, Environmental Services	<ul style="list-style-type: none"><li>• Plan Feasibility</li><li>• DWSD Operations and Capital Needs</li></ul>
3.	Lyn Roberts, Wayne County Deputy CFO	<ul style="list-style-type: none"><li>• Plan Feasibility</li><li>• DWSD Economics</li></ul>
4.	Kelly Cave, Chief Engineer, Wayne County Department of Environment	<ul style="list-style-type: none"><li>• DWSD Capital Needs</li><li>• Feasibility of continuation of DWSD in present form.</li></ul>
5.	Elmeka Steele, Director, Wayne County Facilities Management, Department of Public Service, Environmental Services	<ul style="list-style-type: none"><li>• Plan Feasibility</li><li>• DWSD Operations and Capital Needs</li></ul>
6.	Alan Helmkamp, Wayne County Assistant County Executive	<ul style="list-style-type: none"><li>• Plan Feasibility</li><li>• Debtor’s Good Faith</li></ul>

7.	Sue F. McCormick, Director DWSD	<ul style="list-style-type: none"> <li>• Plan Feasibility</li> <li>• DWSD Operations</li> <li>• DWSD Capital Needs</li> <li>• DWSD History</li> <li>• Viability of DWSD as currently operating</li> </ul>
8.	Nicolette Bateson, CFO, DWSD	<ul style="list-style-type: none"> <li>• Plan Feasibility</li> <li>• DWSD Operations</li> <li>• DWSD Capital Needs</li> <li>• DWSD History</li> <li>• Viability of DWSD as currently operating</li> </ul>
9.	Bart Foster, rate consultant to DWSD	<ul style="list-style-type: none"> <li>• Plan feasibility</li> <li>• Effect of Plan on DWSD rates</li> <li>• Effect of DWSD rates on poverty in City of Detroit</li> </ul>
10.	William Wolfson, Chief Operating and Compliance Officer and General Counsel, DWSD	<ul style="list-style-type: none"> <li>• Plan feasibility</li> <li>• DWSD pension obligations.</li> </ul>
11	Kevyn D. Orr, Emergency Manager, City of Detroit	<ul style="list-style-type: none"> <li>• Plan feasibility</li> <li>• DWSD viability</li> <li>• DWSD finances and capital needs</li> <li>• Potential DWSD transactions</li> <li>• DWSD operations.</li> </ul>
12.	Kenneth Buckfire, CEO and Managing Director, Miller Buckfire, City of Detroit financial advisors	<ul style="list-style-type: none"> <li>• Plan feasibility</li> <li>• DWSD viability</li> <li>• DWSD finances and capital needs</li> <li>• Potential DWSD transactions</li> <li>• DWSD operations.</li> </ul>
13.	Charles M. Moore, Senior Managing Direct at Conway MacKenzie, Inc. operational restructuring advisors.	<ul style="list-style-type: none"> <li>• Plan feasibility</li> <li>• DWSD viability</li> <li>• DWSD finances and capital needs</li> <li>• Potential DWSD transactions</li> <li>• DWSD operations.</li> </ul>
14.	Gaurav Malhotra, Principal of Ernst & Young LLP, financial restructuring advisors to City	<ul style="list-style-type: none"> <li>• Plan feasibility</li> <li>• DWSD viability</li> <li>• DWSD finances and capital needs</li> <li>• Potential DWSD transactions</li> <li>• DWSD operations.</li> </ul>

15.	Vyto Kaunelis, OHM Advisors, advisor to City with respect to DWSD capital improvements	<ul style="list-style-type: none"> <li>• Plan feasibility</li> <li>• DWSD capital improvement needs</li> </ul>
16.	James Fausone – Chairperson, DWSD Board of Water Commissioners	<ul style="list-style-type: none"> <li>• Plan feasibility</li> </ul>
16.	Any witness listed on any other witness list filed	
17.	Any rebuttal witnesses	
18.	Any witness necessary to authenticate any documents.	

Wayne County reserves the right to supplement the testimony topics associated with any witness and to amend its witness list as may be necessary.